

From: Frank John DeBenedetti III <frank_debenedetti@yahoo.com>
To: piu@doj.ca.gov <piu@doj.ca.gov>; ANTITRUST <antitrust@ftc.gov>; Alan Friedman <afriedman@ftc.gov>; Andria Jones <ajones3@ftc.gov>
Sent: Friday, June 16, 2023 at 05:19:38 AM PDT
Subject: Re: Notification of rank change. Project: golftraxx.com

An unnatural drop in demand is shown in the latest cloudflare graph today.

A meteoric 80- 90% drop in page requests occurred last night.

It is ESSENTIAL to note that our course maps where we HAVE GPS data are still being shown by the site. What's happened is where we DON'T have GPS data, there is now nothing shown.

Our claim is that Google has been creating fake demand for mapping services (counterfeit), and has fraudulently billed several thousand dollars of this fake demand in recent months, and we wondered if there might be an opportunity to prove it. Google has suspended our API billing account and given us 30 days to pay or it will remove it, which provides interesting feedback.

A sudden 90% drop in site volume observed today and is shown in screenshot one attached. Note also the same screenshot shows a map of courses just requested for the Minneapolis metro area. Of course this means that the meteoric drop is NOT because the course maps stopped showing. Where we have GPS data, those course maps are still showing on the website. Note that there are mostly yellow flags but also approximately a dozen green flags on the map shown in the image. The green flags are courses where we don't yet have GPS data.

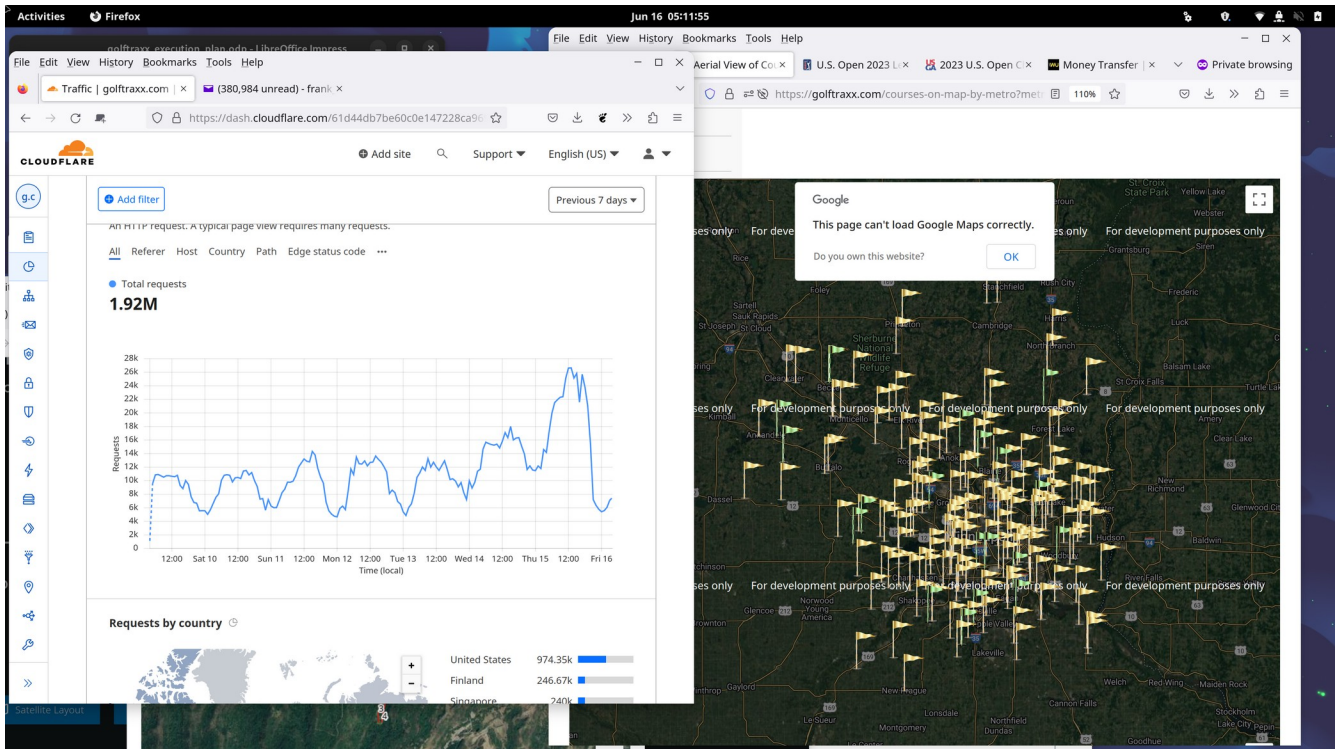
Please have a look at screenshots two and three which show the map being shown by Google where we have GPS data (as usual except showing development mode) versus the map now shown when requesting a course where we don't have data. Until yesterday, Google opted to show a map for the address. So nearly 90% of the mapping services provided by Google were for the small percentage of courses on our site that DID NOT have GPS coordinates.

What is worth repeating is that where we have course GPS data, the maps ARE STILL BEING SHOWN!!! Where we don't have GPS data, the site now shows a blank page.

The meteoric drop in requests is therefore incontrovertible PROOF that close to 90% of the mapping services Google has IN FACT been billing us for in recent months are for courses where we did NOT have GPS data. This artificial counterfeited demand was DRIVEN by Google's inexplicable assignment of page rankings of 1,2, or 3 where not warranted (since we did not have GPS data) to smear the golftraxx.com website and FRAUDULENTLY bill for massive amounts of API mapping "services" where we had NO DATA.

Google has officially refused to issue ANY credit for the services it "provided" in the past 4 months, insisting there was NO fraud, despite the fact that these services were provided AFTER Google suddenly added these high rankings to our pages where we did not have content.

This is what happens when Google controls too many parts of the channel. It can counterfeit demand to enrich itself.



Frank John DeBenedetti III <frank_debenedetti@yahoo.com>

To:piu@doj.ca.gov,civil.feedback@us.doj.gov,ANTITRUST,Alan Friedman,Andria Jones

Thu, Jun 1 at 4:41 PM

During the past month, here at golfraxx.com we ran an experiment with the Philippines, one of the 150 countries we have collected golf course information. We realized that since over 90% of Filipinos speak English that adding course information for courses we have not yet gathered course information for in the Philippines, we would very likely see an increase in visits from the country.

During the first three weeks, that's EXACTLY what we did see. Requests received by golfraxx.com from the Philippines increased from less than 1,000/week to 2.5 thousand per week as we increased the count of courses we have scorecards and hole by hole mapping from approximately 30 to close to 90 of the 107 golf courses in the Philippines.

This was as expected.

What was NOT expected is what happened next. Google apparently observed we were receiving substantially more requests and REMOVED golfraxx pages for courses in the Philippines we have previously submitted for inclusion in its index from inclusion in Philippines course results...pretty much ENTIRELY.

This is of course PREDATORY. This reduced requests from 2.5 thousand per week to LESS than 1,000 is the past week. Google simultaneously removed results for golfraxx from 15 other countries COMPLETELY!!

Even where we're the only website providing the data for SEVERAL courses in the Philippines, Google continues to use a financially driven approach to indexing and ranking and EXCLUSION at the expense of quality of data in results.

It should be of GREAT concern to regulators that Google continues its predatory practice at the expense of the promise of AI and Chat-GPT. It should be of further concern that these larger corporate partners of Google then STEAL our research where they either had wrong information and/or no information as their own.

As long as Google's ranking algorithms are financially driven and predatory towards small businesses instead of quality-driven, Google's operational premise regarding content inclusion is DIAMETRICALLY OPPOSED to the promise of AI and Chat-GPT!!

For Chat GPT to work there still needs to be qualitative review of links discovered and ranking based upon a qualitative review of the content in those links Google represents that it does so, yet we have demonstrated at least a hundred times in the past several years that Google ACTUALLY does the opposite.

We also observed that several courses in the Philippines that we had NO RESULTS for when we started the project were ranked HIGHLY by Google in the top 3 positions of search results at the start of the project now are ENTIRELY removed from it's results. This fraudulently drives up to 70% of web traffic to our page where Google knows we have NO DATA.

Regulators should use their review of Google's actions towards golftraxx.com in the past 2 weeks as it relate to Philippines golf course data as a microcosm representative of the continuing misdeeds and predatory nature of this corporation and act swiftly with vengeance when they see what will be obvious from Google's own actions.

Google CANNOT be entrusted to ethically and responsibly manage ANY part of the process to approve or publish content, or to rank websites with its LIE-filled dynamic ranking, let alone manage simple DNS lookups where it unethically imposes unnecessary DNS lookups to sabotage websites it wished to kill.

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On Monday, June 5, 2023 at 12:11:56 AM PDT, Frank John DeBenedetti III
<frank_debenedetti@yahoo.com> wrote:

In the past several months, Google has CONTINUED TO SYSTEMATICALLY REDUCE the number of indexed pages for golftraxx.com from 550,000 to 84,000 in its latest update as we have reported to you on multiple occasions.

We have also reported on several occasions that we continue find Google ranking our pages where we have no content for a course highly in its ranking, apparently to showcase the fact that we don't have content for the course. We believe this practice is predatory and is in fact a SMEAR campaign executed repeatedly by Google against our site.

We wish to point out that several months ago when there were 550,000 golftraxx pages indexed by Google we had ZERO pages with a ranking between 1-3.

Simultaneous with Google's exclusion of MOST of our pages of excellent content, Google has now newly ranked 534 of our pages with rankings of 1 - 3. On the surface that would appear to be a good thing IFF we have content for the courses where Google ranked the pages highly.

However, what we continue to find is when we come across these highly ranked pages and update the content for that page, is that Google IMMEDIATELY removes that page from its index COMPLETELY once we fix it and reduces its ranking of the fixed page into the 20-30 level so that it's no longer likely to ever be found...

We also continue to find VERY troubling pages like these I provide today where some unknown force changed the data we had for 4 different courses in a 72 hole property in the Philippines such that they all had identical data for scorecards and GPS data.

From the start, it MUST be clear that NONE of our editors would EVER set 4 courses with different names, layouts and scorecard on the same property to have to exact same content for scorecard and GPS.

We STRONGLY BELIEVE that the way these 4 courses came to have the identical content is through the ILLEGAL and DESPICABLE actions of COMCAST and Google against our website. One indicator of malfeasance is the simple fact that all 4 of these courses with incorrect mapping, yet were ranked number 1 by Google in Search results for EACH of the 4 course names. Google KNEW that the data had been changed so that all 4 courses had IDENTICAL data our site and also knew that the 4 different courses in our data were identical yet STILL ranked them with 1's on each separate name. Google had high in its ranking other websites which showed DIFFERENT data for each course (as ours did previously), yet ranked those sites LOWER than our site where tOUR data had been changed to all be the same.

I present to you this argument: Google is charging us for the mapping services which are increasing and increasing each month. However, we are seeing that according to Diib only 8% of site visitors are returning to the site. We KNOW that pages ranked in the top 3 positions receive close to 70% of the internet traffic. Google can be attributed to have KNOWLEDGE that it is highly ranking golftraxx pages where incorrect mapping or NO mapping has occurred, it is in fact committing fraud with respect to its billing of mapping services for the courses it ranks highly that it KNOWS or can be inferred to

MUST have known contained incorrect content.

Google has fraudulently billed us tens of thousands of dollars for providing mapping services where it knew that what the vast majority of was being shown (92%) were our course pages that contained incorrect mapping by its own malicious ranking likely its own malicious harm to those pages. .

How can this possibly be tolerated by our nation??? It IS criminal fraud deserving of criminal prosecution.

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The latest STUNT by Google of doing based on the six site measurements is guaranteeing Google a way out its predicament of not being able to keep selling tracking data by forcing other sites who gather and publish information into "starvation." We're seeing massive and inexplicable OVERNIGHT drops in certain metric performances such as speed index which we don't believe are credible.

If we work to fix as directed by Google Search Console and Light Speed and reach Good ratings on these six , Google should NOT have the right to instantly redirect traffic to itself by re-rating to POOR one or more overnight (such as our speed index) without warning or justification.

After Google has successfully "starved" sites from their visitors and their deserving traffic, it and its partners can simply screen scrape that site's content for itself. Disgusting.

DOWN with Google's manipulative and predatory practices at the ABSOLUTE EARLIEST!!

Overview

85/100Needs Improvement

Total Blocking Time

160 msGood

Largest Contentful Paint

2.6 sNeeds Improvement

Cumulative Layout Shift

0Good

First Contentful Paint

1.7 sGood

Speed Index

5.9 sPoor

Time to Interactive

6.4 sNeeds Improvement

Our team members have reported that it seems "very strange" that the speed metric drops massively overnight without explanation or justification.

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